

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re:

JOANN INC.,<sup>1</sup>

Post-Effective Date Debtor.

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Chapter 11

Case No. 25-10068 (CTG)

**Re: Docket Nos. 760 & 930**

**CERTIFICATION OF COUNSEL REGARDING AMENDED FIRST  
NOTICE OF ASSUMPTION AND ASSIGNMENT OF CERTAIN  
EXECUTORY CONTRACTS AND/OR UNEXPIRED LEASES**

The undersigned counsel to Ann Aber in her capacity as Plan Administrator in the above-captioned cases (the “Plan Administrator”), hereby certifies as follows:

1. On April 28, 2025 the debtors and debtors-in-possession in the above-captioned cases (the “Debtors”) filed the *First Notice of Assumption and Assignment of Certain Executory Contract and/or Unexpired Leases* [Docket No. 760] (the “First Assumption Notice”) regarding the assumption and assignment of the unexpired leases set forth on Schedule 2 to the First Assumption Notice (the “Original Assumption List”).

2. On May 16, 2025, the Debtors filed the *Amended First Notice of Assumption and Assignment of Certain Executory Contracts and/or Unexpired Leases* [Docket No. 930] (the “Amended First Assumption Notice”). Attached as Schedule 2 to the Amended First Assumption Notice was a revised schedule of unexpired leases (the “Revised Assumption List”). Attached as Schedule 3 to the Amended First Assumption Notice was a proposed form of order (the “Assumption Order”) authorizing the assumption and assignment of the unexpired leases on the Revised Assumption List.

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<sup>1</sup> The Post-Effective Date Debtor in this chapter 11 cases, along with the last four digits of its federal tax identification number, is JOANN Inc. (5540). The Post-Effective Date Debtor’s mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

3. The deadline to object to the Amended First Assumption Notice was May 30, 2025 (the “Objection Deadline”).

4. On May 12, 2025, the landlord of Store No. 2575 (the “Landlord”) filed *T Mesquite MKT WVS TX, LLC’s Limited Objection to the Proposed Cure Amount for Debtors to Assume and Assign the T Mesquite MKT WVS TX, LLC Commercial Lease to Burlington Coat Factory of Texas, L.P.* [Docket No. 843] (the “Objection”). The Objection was withdrawn at Docket No. 1061.

5. Attached as **Exhibit A** is a revised Assumption Order (the “Revised Assumption Order”). A blackline comparing the Revised Assumption Order to the Assumption Order is attached hereto as **Exhibit B**.

6. Accordingly, the Plan Administrator requests entry of the Revised Proposed Order attached hereto as **Exhibit A** at the Court’s earliest convenience.

Dated: October 20, 2025  
Wilmington, Delaware

*/s/ Jack M. Dougherty*

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**COLE SCHOTZ P.C.**

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